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*Counsel for Class Representatives  
Kerry Lee Hall, Daniel Riebow, and the  
Certified Class of Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**IN RE: CATHODE TUBE (CRT)  
ANTITRUST LITIGATION**

This Document Relates to:  
All Indirect Purchaser Actions

Case No. CV-07-5944-JST  
MDL No. 1917

**CLASS ACTION**

**DECLARATION OF ROBERT J.  
GRALEWSKI, JR. IN SUPPORT OF  
KIRBY McINERNEY LLP'S  
RESPONSE TO LEAD COUNSEL'S  
OMNIBUS RESPONSE TO  
OBJECTIONS TO PROPOSED  
ALLOCATION OF AGGREGATE  
FEE AWARD TO INDIRECT  
PURCHASER PLAINTIFFS'  
COUNSEL**

Court: JAMS  
Special Master: Martin Quinn, JAMS  
Judge: Honorable Jon S. Tigar

DECLARATION OF ROBERT J. GRALEWSKI, JR. IN SUPPORT OF KIRBY McINERNEY LLP'S RESPONSE  
TO LEAD COUNSEL'S OMNIBUS RESPONSE TO OBJECTIONS TO PROPOSED ALLOCATION OF  
AGGREGATE FEE AWARD TO INDIRECT PURCHASER PLAINTIFFS' COUNSEL

CASE NO. CV-07-5944-JST, MDL NO. 1917

1 I, Robert J. Gralewski, Jr., declare as follows:

2 1. I am an attorney licensed to practice before all state and federal courts in the state of  
3 California, and I am a partner in the law firm Kirby McInerney LLP ("KM"). I have personal  
4 knowledge of the facts stated in this declaration and, if called as a witness, I could and would  
5 testify competently to them. I make this declaration in support of my firm's Response to Lead  
6 Counsel's Omnibus Response to Objections to Proposed Allocation of Aggregate Fee Award to  
7 Indirect Purchaser Plaintiffs' Counsel ("KM's Response").

8 2. To the extent not otherwise supported, all factual assertions made in KM's  
9 Response are truthful and accurate and are based on contemporaneous email communications with  
10 Lead Counsel and others. KM consents to share all of these emails with the Special Master on an *in*  
11 *camera* basis if requested.

12 3. In connection with the class certification proceedings in this case, I worked closely  
13 with Indirect Purchaser Plaintiffs' expert on developing ways to determine how to identify the  
14 manufacturers of the CRTs inside of products at issue, whether still in one's possession or not.

15 4. KM's Japanese speaking lawyers Akiko Kikuchi and Sawaka Nagano played an  
16 important role in the CRT case. It is my understanding based on my involvement in the CRT case  
17 and due diligence that I performed in connection with KM's Objection to Lead Counsel's Proposed  
18 Allocation of Aggregate Fee Award to Indirect Purchaser Plaintiffs' Counsel that both Ms. Kikuchi  
19 and then Ms. Nagano worked closely with Nathan Cihlar, who, with the assistance of Shinae Kim-  
20 Helms, led the team of Korean, Japanese, and Chinese lawyers. In connection with this work, Mr.  
21 Cihlar gave Ms. Kikuchi supervisory responsibilities that included overseeing the collection of  
22 evidence and other information from other Japanese reviewers on the foreign language team and  
23 summarizing the progress of all of the Japanese reviewers. After Ms. Kikuchi left KM, Ms.  
24 Nagano replaced her on the foreign language team. Because of her superior Japanese language  
25 ability and her quick grasp of the case, Ms. Nagano was tasked with higher level assignments such  
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1 as helping with transliteration for objection responses and serving as a check translator for  
2 depositions.

3 5. Before any discussion about implementing a rate cap (which I believe first occurred  
4 in August 2015), I reached out to Lauren Capurro in mid-July 2015 about how to categorize  
5 document review time in connection with deposition preparation. Initially I had instructed my staff  
6 to categorize such time as "Deposition Preparation" because I thought that was most accurate. Ms.  
7 Capurro subsequently informed me that any Tier 1 reviewer who was reviewing documents in  
8 connection with deposition preparation should have their time categorized as "Document Review."  
9 She also informed me that if an attorney was running searches and writing memoranda in  
10 connection with preparing for a deposition, then that time should be categorized as "Deposition  
11 Preparation." After receiving these instructions, we carefully reevaluated all of William Harris'  
12 and Karina Kosharsky's time entries and re-categorized all of their time consistent with Ms.  
13 Capurro's instructions. Indeed, in an email to Ms. Capurro on July 22, 2015, I indicated that we  
14 were categorizing our time consistent with her instructions. Thereafter, when LC instituted the rate  
15 cap in I believe August 2015, all of Mr. Harris' and Ms. Kosharsky's document review time done  
16 in connection with deposition preparation was automatically capped at \$350.

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18 Dated: September 23, 2016

Respectfully submitted,

19 /s/ Robert J. Gralewski, Jr.  
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